

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

**In re:** )  
 ) **CHAPTER 7**  
 )  
 **TRAVIS RICHARD FELIX and** ) **BANKRUPTCY NO. 19-12632**  
 **MELISSA ANN FELIX,** )  
 ) **SUPPLEMENTAL RESPONSE**  
 ) **TO OBJECTION TO HOMESTEAD**  
 Debtor. ) **EXEMPTION**

**COME NOW** the above-named debtors by and through their undersigned attorney, **Tom Lester**, of the law firm of Lester & Associates, P.S., Inc., and by way of supplemental response to the Objection to Homestead Exemption filed by the Banner Bank, state as follows:

In addition to the Declaration of Non-Abandonment recorded on July 2, 2019, Debtors recorded a Homestead Declaration on July 20, 2017.<sup>1</sup> That declaration fulfills all the requirements of R.C.W. 6.13.040. It identifies the property claimed as a homestead with the legal description, Debtors' intent to reside in the property upon return from work in Colorado, that Debtors have no other homestead property and the estimated cash value of the property. Banner Bank's judgment was entered on September 29, 2017. Thus, Debtors' homestead exemption in 672 Birch Bay Lynden Road, Lynden should be allowed.

<sup>1</sup> A true and accurate copy of the recorded document is attached as Exhibit A.

1 If there is any question as to the intent of these young Debtors, who are parents of three  
2 young children, to return to their homestead property in their hometown where all their family  
3 resides, then an evidentiary hearing should be scheduled.

4 **RESPECTFULLY SUBMITTED** this 7<sup>th</sup> day of February, 2020.

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6 /s/ Tom Lester  
7 **Tom Lester, WSBA #15814**  
8 Attorney for Debtors  
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